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Attorneys for NEW YORK ROWING ASSOCIATION, INC. and
PETER J. SHARP BOATHOUSE, INC.
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(212) 490-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Complaint of Andrew Harnett, as
owner of vessel M/V READY JET GO for Exoneration
from or Limitation of Liability.

and

In the Matter of Peter J. Sharp Boathouse, Inc., as owner of
the floating vessel constituting the boathouse, seeking
exoneration from or limitation of liability.

**1:06-cv-00699(LMM)(GWG)
consolidated with:
1:06-cv-03061(LMM)(GWG), and
1:06-cv-03062(LMM)(GWG)**

and

In the Matter of New York Rowing Association, Inc., as
owner of a 2001, coxless Empacher rowing shell, seeking
exoneration from or limitation of liability.

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STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

REPLY AFFIDAVIT OF LAWRENCE B. BRENNAN

I, Lawrence B. Brennan, being duly sworn and deposed says:

1. I am a member of the Bar of this Court, the firm Wilson Elser Moskowitz
Edelman & Dicker LLP, and I am the attorney of record for Petitioner, Peter J. Sharp
Boathouse, Inc., and Petitioner/Claimant New York Rowing Association, Inc. I am fully

familiar with the facts of this matter based upon personal knowledge and review of the file maintained by my office.

2. I submit this attorney's affidavit to introduce and to summarize evidence discussed in our Reply Memoranda of Law in further support of the i) Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, ii) the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, iii) the Motion for Partial Summary Judgment on Damages, and iv) the Motion for Partial Summary Judgment, which are filed on behalf of the New York Rowing Association and the Peter J. Sharp Boathouse.

3. The following Exhibits are annexed and respectfully submitted:

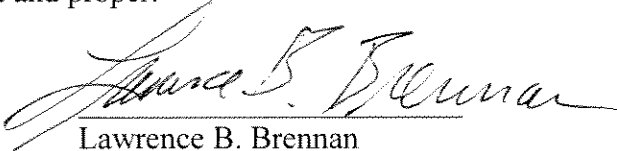
Exhibit Q Statement of Undisputed Material Facts Pursuant to all Parties' Responses to the Request for Admission and Rule 56.1 Statement propounded by New York Rowing Association, Inc. and Peter J. Sharp Boathouse, Inc.

Exhibit R A copy of the Expert Report of the Chalfin Group

Exhibit S A copy of the Expert Report of Warren M. Johnson

WHEREFORE, it is respectfully requested that the Court grant the i) Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, ii) the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, iii) the Motion for Partial Summary Judgment on Damages, and iv) the Motion for Partial Summary Judgment, filed on behalf of the New York Rowing Association, Inc. and the Peter J.

Sharp Boathouse, Inc., and grant the Rowing Association and the Boathouse such other and further relief as may be just and proper.


Lawrence B. Brennan

Sworn to before me
this 22nd day of November, 2011

Notary Public

CERTIFICATE OF SERVICE

I, Brooke Travis, hereby certify that I electronically filed the attached Attorney's Affidavit of Lawrence B. Brennan in Reply Memoranda of Law in further support of the Motion *in limine* to Preclude the Report and Expert Testimony of Harriet M. Metcalf, the Motion *in limine* to Preclude Claims for Lost Earnings and Lost Inheritance, the Motion for Partial Summary Judgment on Damages, and the Motion for Partial Summary Judgment, filed on behalf of the New York Rowing Association and the Peter J. Sharp Boathouse, with the Clerk of the Court using the CM/ECF system which will send notification of such filing electronically to the following:

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/s/ Brooke Travis